

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
Western Division**

J&J SPORTS PRODUCTIONS, INC.,)
Plaintiff,)
v.) **Case No. 2012-cv-50226**
HILDA ARGUETA, DANIEL ARGUETA and)
JOHN ARGUETA, indv. and d/b/a)
CHARLIE’S RESTAURANT AND BAR INC.)
d/b/a CHARLIE’S RESTAURANT AND BAR)
and CHARLIE’S RESTAURANT AND BAR)
INC. d/b/a CHARLIES’ RESTAURANT AND)
BAR,)
Defendants.)

**PLAINTIFF'S MOTION TO ENTER AN ORDER OF JUDGMENT AGAINST
DEFENDANTS**

NOW COME the Plaintiff, J&J SPORTS PRODUCTIONS, INC., and respectfully requests that this Court Reinstate this matter against Defendants, JOHN ARGUETA, indiv. and d/b/a CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR and CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR, and in support thereof, states as follows:

1. That on March 27, 2013, this matter was dismissed without prejudice by this Honorable Court.
2. That a Settlement Agreement was entered into by both parties wherein which the Defendants would pay a total of \$5,000.00 to the Plaintiff. Payments in the amount of \$200.00 were to be made on or before the 15th of each month beginning on February 15, 2013 and continuing through January 15, 2014. See attached Exhibit A.
3. On April 2, 2014, this matter was reinstated.

4. On December 18, 2014, Defendant, John Argueta, sat for his deposition (attached hereto as Exhibit A), and he admitted that he signed the Release (attached as Exhibit A2) and agreed to pay \$5,000.00 to settle the case.

5. Defendant, John Argueta, also admitted that he only made partial payment on the settlement agreement set forth in the release.

6. Defendant, John Argueta, also admitted that he was the President and owner of Defendant, CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR.

7. As of the filing of this motion, Defendant has paid Plaintiff a total of \$400.00 towards the \$5,000.00 settlement which was made in 2013. See Exhibit A1.

8. That pursuant to the Settlement Agreement, Defendant currently owes Plaintiff a total amount of \$4,600.00 plus attorney's fees in the amount of Four Thousand Eight Hundred and 00/100 (\$4,800.00). See attached Affidavit Exhibit B.

9. Additionally, pursuant to the Settlement Agreement, Defendants agreed to pay a \$3,000.00 penalty fee should they default in payment. See Exhibit A2.

WHEREFORE, Plaintiff, J&J SPORTS PRODUCTIONS, INC., prays this Honorable Court enter an Order for Judgment in favor of Plaintiff and against Defendants, JOHN ARGUETA, indiv. and d/b/a CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR and CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR, in the amount of Four Thousand Six Hundred and 00/100 (\$4,600.00) plus attorney's fees in the amount of Four Thousand Eight Hundred and 00/100 (\$4,800.00) and Three Thousand and 00/100 (\$3,000.00) in penalty fees for a total Judgment in the amount of Twelve Thousand Four Hundred and 00/100 (\$12,400.00) and for any additional relief for Plaintiff this Honorable Court deems just.

Respectfully submitted,

s/Andre Ordeanu

Andre Ordeanu

CERTIFICATE OF SERVICE

I, Andre Ordeanu, on oath state that a true and correct copy of the Notice of Filing was electronically filed with the Clerk of the Court on January 15, 2015, using the CM/ECF system which will send notification of such filing(s) to all attorneys of record and mailed a copy to Defendants, JOHN ARGUETA, indv. and d/b/a CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR and CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR, . Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

s/ Andre Ordeanu

Andre Ordeanu

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